

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – LAW DIVISION

FRANCES GECKER, Solely as Chapter 7
Trustee for CYNTHIA COLLINS,

Plaintiff,

-VS-

MENARD, INC., a/k/a MENARDS,

Defendant.

No:

COMPLAINT AT LAW

NOW COMES the Plaintiff, FRANCES GECKER, SOLELY as Chapter 7 Trustee for CYNTHIA COLLINS, by and through her attorneys, CUDA LAW OFFICES, LTD, and as and for her Complaint at Law against the Defendant, MENARD, INC., a/k/a MENARDS (hereinafter referred to as “defendant”) states as follows:

- 1) On or about April 29, 2014, the defendant MENARD, INC., a/k/a MENARDS was operating a business at 8311 West North Avenue, Melrose Park, Illinois.
- 2) On or about April 29, 2014, and at all relevant times herein, the defendant had a duty to maintain the premises in a safe and reasonable manner so that the plaintiff and others could be safe and secure therein.
- 3) On the aforementioned date, CYNTHIA COLLINS was lawfully on the defendant's premises and was at all relevant times in the exercise of due care and caution for her safety and the safety of others.
- 4) On the aforementioned date, an employee of the defendant hit CYNTHIA COLLINS with a row of shopping carts that he was returning to the store from the parking lot, thereby causing Ms. Collins to sustain injuries.

2016 APR 25 AM 9:35
CLERK OF COURT
JULIE M. HARRIS
CLERK OF COURT

20160004126
CALENDAR/ROOM B
TIME 00:00
PL Other



5) It was the duty of the defendant, prior to, and at the time of this occurrence, to exercise reasonable care and caution in and about the ownership, operation, maintenance and control of the aforementioned premises, so that it would be in a good, safe, and proper condition for persons legally and lawfully in and upon said premises to use and walk upon, and so as not to cause harm and injury to such persons.

6) In violation of its' duty, the defendant, prior to and at the time of this occurrence, acted or failed to act in one or more of the following ways, amounting to careless and negligent conduct:

- a) Carelessly and negligently employed individuals that did not know how to do perform their duties;
- b) Carelessly and negligently failed to properly train its' employees;
- c) Carelessly and negligently failed to properly supervise its' employees; and
- d) Was otherwise careless and negligent

7) As a direct and proximate result of the aforesaid careless and negligent acts and/or omissions on the part of the defendant and defendant's employee, the plaintiff was caused to be pushed and sustain personal injuries, by reason of which the plaintiff became sick, sore and disordered and suffered injuries both externally and internally as well as great injury to her hip, back, neck, and limbs, thereby suffering great pain; CYNTHIA COLLINS will in the future continue to suffer and be injured; CYNTHIA COLLINS has expended or become liable for sums of money in endeavoring to be cured of her injuries, the exact amount of which Ms. Collins is unable to state at this time. Furthermore, Ms. Collins has become permanently disabled as a result of this accident.

WHEREFORE, Plaintiff, CYNTHIA COLLINS, prays for judgment against Defendant, MENARDS, in a sum in excess of the amount allowed and authorized by the jurisdiction of the Circuit Court of Cook County, Illinois, plus costs of said suit, or for any other relief this Honorable Court deems just.

Respectfully Submitted,



Attorney for Plaintiff

#27099
CUDA LAW OFFICES, LTD.
Attorneys for Plaintiff
6525 West North Avenue, Suite 204
Oak Park, Illinois 60302
(708) 383-4900

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – LAW DIVISION

FRANCES GECKER, Solely as Chapter 7
Trustee for CYNTHIA COLLINS, *

Plaintiff,

-VS-

MENARD, INC., a/k/a MENARDS,

Defendant.

No;

AFFIDAVIT OF DAMAGES
SUPREME COURT RULE 222

The undersigned being first duly sworn upon oath deposes and states the he/she is a party to the above entitled cause of action seeking money damages, and states that this cause of action exceeds \$50,000.00.


Attorney for Plaintiff

CUDA LAW OFFICES, LTD.

6525 West North Avenue, Suite 204

Oak Park, Illinois 60302

708-383-4900

Britta Beckman

From: sop@cscinfo.com
Sent: Tuesday, May 03, 2016 7:40 AM
To: Britta Beckman
Subject: Notice of Service of Process - Transmittal Number: 15103965

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Entity:	Menard, Inc.
Entity I.D. Number:	0033810
Entity Served:	Menard, Inc.
Title of Action:	Frances Gecker, Solely as Chapter 7 Trustee for Cynthia Collins vs. Menard, In
Document(s) type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Cook County Circuit Court, Illinois
Case/Reference No:	2016L004126
Jurisdiction Served:	Illinois
Date Served on CSC:	05/02/2016
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Personal Service

Sender Information:

Cuda Law Offices, LTD
708-383-4900

Primary Contact:

James Anderson
Menard, Inc.

Copy of transmittal only provided to:

Britta Beckman
Jackie Wolowicz

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CCG N001-10M-1-07-05 ()

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, _____ LAW _____ DIVISION

(Name all parties)

FRANCES GECKER, Solely as Chapter 7 Trustee for
 CYNTHIA COLLINS

v.

MENARD, INC., a/k/a MENARDS

SUMMONS

2016L004126
 CALENDAR/ROOM B
 TIME 00:00
 PI Other

PLEASE SERVE:

MENARD, INC.

c/o Prentice Hall Corporation

801 Adlai Stevenson Drive

Springfield, Illinois 62707

2016L004126
 CALENDAR/ROOM B
 TIME 00:00
 PI Other

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- ☒ Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602
- | | | |
|--|---|---|
| <input type="checkbox"/> District 2 - Skokie
5600 Old Orchard Rd.
Skokie, IL 60077 | <input type="checkbox"/> District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008 | <input type="checkbox"/> District 4 - Maywood
1500 Maybrook Ave.
Maywood, IL 60153 |
| <input type="checkbox"/> District 5 - Bridgeview
10220 S. 76th Ave.
Bridgeview, IL 60455 | <input type="checkbox"/> District 6 - Markham
16501 S. Kedzie Pkwy.
Markham, IL 60426 | <input type="checkbox"/> Child Support
28 North Clark St., Room 200
Chicago, Illinois 60602 |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

APR 25 2017

Atty. No.: 27099

Name: CUDA LAW OFFICES, LTD.

Atty. for: Plaintiff

Address: 6525 West North Avenue, Suite 204

City/State/Zip: Oak Park, Illinois 60302

Telephone: 708-383-4900

Service by Facsimile Transmission will be accepted at:

WITNESS, _____

Clerk of Court

Date of service: _____

(To be inserted by officer on copy left with defendant or other person)

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS